

Schnitzer, Edward L.

From: Schnitzer, Edward L.
Sent: Friday, December 13, 2019 4:30 PM
To: 'Hwang, Angeline'; 'TumSuden, Kyle J.'; 'Fail, Garrett'; 'Singh, Sunny'
Cc: 'Project Blue Admin Team'; 'Sears Admin Consent Program'
Subject: RE: Sears/Ninth Omni Objection | Subject to FRE 408
Attachments: You signed: "EBallot_182353801041968_WM#JK28612"

Angeline,

I wanted to follow-up on my email below.

As NorCell's 503(b)(9) claim has been reconciled, and as NorCell opted-in on November 25th (see attached), I am requesting that they be added to the initial distribution.

Thank you.

-Ed



Edward L. Schnitzer | Partner | Chair of Bankruptcy & Financial Restructuring Group
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7781 | Fax: 212-599-5085 | eschnitzer@mmwr.com | [Attorney Profile](#)

From: Schnitzer, Edward L.
Sent: Monday, December 9, 2019 10:02 AM
To: Hwang, Angeline <Angeline.Hwang@weil.com>; TumSuden, Kyle J. <Kyle.TumSuden@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny <sunny.singh@weil.com>
Cc: Project Blue Admin Team <Project.Blue.Admin.team@weil.com>; 'Sears Admin Consent Program' <searsadminconsentprogram@miiipartners.com>
Subject: RE: Sears/Ninth Omni Objection | Subject to FRE 408
Importance: High

Angeline,

As the debtors agreed to withdraw the objection and had agreed with the amount of the claim, can you please have NorCell's claim removed from the Ninth Omnibus Claims Objection? NorCell is still being listed as going forward (see Docket No 6162) and it is causing confusion and stress, and unnecessary time spent reviewing pleadings.

Thank you.

-Ed



Edward L. Schnitzer | Partner | Chair of Bankruptcy & Financial Restructuring Group
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7781 | Fax: 212-599-5085 | eschnitzer@mmwr.com | [Attorney Profile](#)
